

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL  
PARK, LLC, and

TIGER KING, LLC,

*Defendants.*

Case No. 6:20-cv-00423-JFH

**MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiff, United States of America, by authority of the Attorney General of the United States and through its undersigned attorneys, files this motion pursuant to Federal Rule of Civil Procedure 65(b), and respectfully moves this Court for a temporary restraining order against Jeffrey and Lauren Lowe, Greater Wynnewood Exotic Animal Park, LLC, and Tiger King, LLC (collectively, “Defendants”) pending hearing on its recently-filed Motion for Preliminary Injunction. Dkt. 27. Because of the recent euthanasia of a young male tiger from Defendants’ facility due to complications from metabolic bone disease—a painful but preventable dietary disorder—in violation of the court-approved stipulation, the United States requests that the Court issue an order transferring all Big Cats,<sup>1</sup> 1-year-old or younger, in their care, custody, possession, or control to the United States for temporary placement at reputable facilities selected by the United States. Based on information provided during the December 15, 2020 inspection and the inventory that Defendants provided on December 16, 2020, this would include the following young Big Cats: Odeza, Pleiades, Daniel (if he is still alive), Shadow, Chanel (if he is still alive), Mirage, Caesar, Moose, Abby, Bubbles, Maggie, and Leigha. Dkt. 28-35.

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<sup>1</sup> In this motion and its supporting memorandum, Plaintiff uses the term “Big Cats” to refer to lions, tigers, and hybrids thereof.

Further, given the age of these young Big Cats, we also request that the Court order that the animals' mothers also be moved to the facilities with their respective cubs. This motion is supported by the accompanying Memorandum in Support of Motion for Temporary Restraining Order, and Declarations and Exhibits thereto.

Pursuant to LCvR 7.1(f), counsel for the United States has attempted to confer with opposing counsel to resolve this matter. However, the parties were unable to reach an accord on the issues advanced in this motion.

DATED: December 30, 2020

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Respectfully Submitted,

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/s/ Mary Hollingsworth  
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